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Attorneys for Plaintiff Langlois Enterprises, Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

LANGLOIS ENTERPRISES LTD.,

No. 3:24-cv-00921

Plaintiffs,

vs.

**M/V GLORY, IMO No. 9288473, her
engines, tackle, appurtenances, etc., *in
rem*, and PRIMERA SHIPPING
INCORPORATED, as Owners of the M/V
GLORY,**

Defendants

MOTION TO ALLOW VESSEL TO LOAD OR
DISCHARGE CARGO, BURN FUEL,
COMPLETE REPAIRS, AND MOVE WITHIN
THE PORT

Plaintiff Langlois Enterprises Ltd., upon suggesting to the Court that pursuant to Rule C of the Supplemental Rules for Certain Admiralty and Maritime Claims a Warrant of Arrest has been issued commanding the U.S. Marshal to arrest the M/V GLORY and in the interest of allowing the vessel to shift within the district and to conduct cargo or perform repairs, Plaintiff seeks to have

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this Court issue an order allowing the vessel to move within the district and to conduct cargo operations or perform repairs.

Dated this 10th day of June, 2024.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

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